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Mr. Vernon A. Williams, Secretary
Surface Transportation Board
1925 K Street NW
Suite 700
Washington, DC 20423-0001

Re: Major Rail Consolidation Procedures
STB Ex Parte No. 582 (Sub-No. 1)



Dear Mr. Williams:

This letter is to provide the Board with Supplemental Comments of the Transportation Communications International Union (TCIU), the International Association of Machinists and Aerospace Workers (IAMAW), the International Brotherhood of Electrical Workers (IBEW), and the American Train Dispatchers Department of the International Brotherhood of Locomotive Engineers (ATDD). We join in the Comments filed by the Rail Labor Division of the Transportation Trades Department of the AFL-CIO (TTD), but file these Supplemental Comments to address how the Board's proposed rules respond to the concerns we raised separately in response to the advance notice of proposed rulemaking (APNR).

In our Comments responding to the APNR, we joined in the TTD position urging the Board to abandon "cram-down" entirely. Alternatively, we proposed the adoption of a rule regulating its use, that we modeled on the UTU-NCCC agreement. As detailed in our comments, our proposal differed from the UTU-NCCC agreement in several material respects. Significantly, we took a different approach regarding the transfer of work, an issue which affects the non-operating crafts to a far greater extent than the operating crafts.

While we are disappointed that the Board has not adopted our proposal, we take seriously the Board's encouragement of the parties to attempt to resolve this issue through private agreements and the Board's specific urging that the parties negotiate resolution of contentious issues such as mandatory employee relocation. Our position on mandatory relocation is set out in

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some detail in the TTD comments. (TTD Comments to ANPR pp. 19-24). As suggested by the Board, we will attempt to negotiate a broad based agreement on these issues and will report back to the Board on our progress.

In accordance with the Board's Rules, 25 copies of these Supplemental Comments and a diskette formatted in Wordperfect 6/7/8 are enclosed. A copy has been served by mail on all parties on the service list.

Respectfully submitted,



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